

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address

☒ Individual appearing without attorney  
☒ Attorney for: Heide Kurtz, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re:  
MICHAEL THOMAS GRUMBINE,

CASE NO.: 2:15-bk-16851-ER  
CHAPTER: 7

## NOTICE OF SALE OF ESTATE PROPERTY

Debtor(s).

**Sale Date:** 08/12/2020

**Time:** 10:00 am

**Location:** United States Bankruptcy Court, Courtroom 1568, 255 E. Temple Street, California 90012

**Last date to file objections: 07/29/2020**

Certain royalty payments payable by Foot Technologies, Inc. as well as any assets of Belize Investment, Services, Inc. including but not limited to patents and trademarks (the “Assets”)

Condition of Property: Assets purchased "as-is" without any representations or warranties of any kind

Subject to Overbid: The sale of the Assets is subject to overbid.

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**Overbid procedure (if any):** See Proposed Overbidding Procedures attached as Exhibit 1 hereto.

---

---

**If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:**

---

---

---

---

---

---

**Contact person for potential bidders (include name, address, telephone, fax and/or email address):**

Carmela T. Pagay, Esq.  
Levene, Neale, Bender, Yoo & Brill L.L.P.  
10250 Constellation Boulevard, Suite 1700  
Los Angeles, CA 90012  
Telephone: (310) 229-1234  
Facsimile: (310) 229-1244  
Email: ctp@lnbyb.com

---

Date: 07/21/2020

# **Exhibit 1**

**PROPOSED OVERBID PROCEDURES**

**FOR PURCHASE OF PROPERTY**

1. Anyone interested in submitting an overbid with respect to the purchase of the Assets must attend the hearing on the Motion or be represented by an individual at the hearing (either in person or telephonically) with authority to participate in the overbid process.

2. An overbid will be defined as an initial bid of \$5,000 above the \$75,000 proposed purchase price or higher with each additional overbid to be in \$1,000 increments.

3. Overbidders (except for the Purchaser) must deliver a deposit to the Trustee's counsel by way of cashier's check made payable to "Heide Kurtz, Chapter 7 Trustee," in the amount of \$15,000 (the "Deposit") no later than 7 calendar days prior to the hearing on the Motion.

4. Overbidders must purchase the Assets on the same terms and conditions as the Purchaser.

5. The Deposit of the successful overbidder shall be forfeited if such party is thereafter unable to complete the purchase of the Assets within 15 calendar days of entry of the order confirming the sale.

6. In the event the successful overbidder cannot timely complete the purchase of the Assets, the Trustee shall be authorized to proceed with the sale to the next highest overbidder.

7. If there are any qualified overbidders, an auction of the Assets shall be held during the hearing on the Motion (on **August 12, 2020 at 10:00 a.m.**) at which time the Court shall determine the highest and best bid for the Assets.

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
10250 Constellation Blvd., Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF SALE OF ESTATE PROPERTY** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **July 21, 2020**, I checked the CM/ECF docket for this bankruptcy case and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Candice Candice Bryner candice@brynerlaw.com
- Michael E Clark ecf@blclaw.com, notices@blclaw.com;borowitzclark3@gmail.com
- Heide Kurtz (TR) trustee@hkurtzco.com, C169@ecfcbis.com
- Carmela Pagay ctp@lnbyb.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov
- Steven D Wegner sdwegnerlaw@aol.com
- Timothy J Yoo tjy@lnbyb.com

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) **July 21, 2020**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Hon. Ernest M. Robles  
USBC – Central District of CA  
255 E. Temple Street  
Ste 1560 / Ctrm 1568  
Los Angeles, CA 90012

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 21, 2020 Megan Wertz  
Date Printed Name

/s/ Megan Wertz  
Signature